

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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Judge Pallmeyer

MOTION FOR ENLARGEMENT OF TIME

Defendant, LIFE INSURANCE COMPANY OF NORTH AMERICA (“LINA”), by its attorneys, DANIEL K. RYAN and PETER E. PEDERSON, respectfully moves this Honorable Court for a 28-day extension of time, up to January 30, 2008, to respond to the complaint, stating as follows:

1. In this action, plaintiff has asserted a claim to recover disability benefits under an employee welfare benefit plan, as that term is defined by ERISA, 29 U.S.C. § 1002(1).

2. On December 13, 2007, LINA received service of process from the Illinois Department of Insurance. Under the Illinois Insurance Code, service on LINA became effective when it received process from the Department of Insurance, making LINA's response to the complaint due January 2, 2008. LINA seeks a 28-day extension from that date, up to and including January 30, 2008, in which to answer or otherwise plead to the complaint. This time is necessary for defense counsel to obtain the subject administrative record, review it and the allegations of the complaint, prepare an appropriate responsive pleading, and obtain their client's comments on the pleading.

3. For these reasons, LINA respectfully moves this Honorable Court for a 28 day extension of time, up to January 30, 2008, in which to answer or otherwise plead to the complaint.

Respectfully submitted:

LIFE INSURANCE COMPANY
OF NORTH AMERICA

By: /s/ Peter E. Pederson
One of its Attorneys

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CERTIFICATE OF SERVICE

I, the undersigned attorney, certify that on December 26, 2007, I e-filed this MOTION FOR ENLARGEMENT OF TIME using the Court's CM/ECF system, which will make copies of available to all counsel of record.

/s/ Peter E. Pederson

Service List

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